



November 14, 2019

Ms. Annick Champoux
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Dear Ms. Champoux:

RE: Request for Information on Upcoming Requirements on Packaging in Public Services and Procurement Canada Procurement (EN578-190005)

Please find enclosed comments from the Canadian Biogas Association (CBA), the Ontario Environmental Industry Association (ONEIA), and Ontario Waste Management Association (OWMA) on the Government of Canada's RFI on Upcoming Requirements on Packaging in Public Services and Procurement Canada Procurement (EN578-190005)

The CBA is the collective voice of Canada's biogas sector and is developing the biogas industry to its fullest potential through capturing and processing organic materials to maximize the utility and value inherent within that material. Our members span the entire value chain of the biogas sector and consist of farmers, municipalities, and private sector owners and operators of biogas systems, technology suppliers and consultants, financial and learning institutions, utilities, the waste sector and organic residual generators.

The OWMA is the voice of the waste management sector in Ontario and the largest waste management association in the country. We represent over 250 organizations across the province who manage over 85% of the province's waste. OWMA members have diverse interests and investments in waste collection, landfills, transfer stations, material recycling facilities, resource recovery facilities including energy-from-waste (EFW), organics waste processing and composting, and hazardous waste recycling and safe disposal.

Established in 1991, ONEIA is the business association representing the interests of the environment industry in Ontario. Our network of thousands of contacts includes key people at environmental technology, product and service companies, law, investment and insurance firms, institutes, universities and governments. Through their innovation and experience in Ontario and around the world, Ontario's environment industry provides market-driven solutions for society's most pressing environmental problems.

Our organizations represent members with operations across the country that would be processing recycling, compostable, and organic waste materials for the Canadian government. As a result, we have a specific interest in the work being undertaken in this area to green procurement within the public sector and create greater circularity within our economy. We are very supportive of these efforts; however, we want to ensure current and future infrastructure can properly manage these materials.

The management of compostable products and packaging, in particular ones made from plastic, is currently an issue for our member operators. To date, these products have been introduced



into the marketplace with little to no consultation with the waste management sector. Many of these products have performed poorly because they are not compatible with current composting and anaerobic digestion facilities. In the case of composting, compostable products must be removed at the end of the process, because they do not fully compost. In the case of anaerobic digestion, compostable products function in the same way as non-compostable equivalents and are largely removed during pre-processing.

Another challenge is that for consumers it can be difficult to distinguish between compostable and non-compostable products. The consequence is that consumers will direct a wide variety of products and packaging into the food and organics diversion stream, regardless of those product's actual ability to be composted or digested. The resulting risk then is that these compostable products will attract similar but non-compostable/digestible products and packaging into food and organic waste diversion streams and ultimately increase the amount of contaminants that must be removed. The reverse is also true – a high-risk consumer confusion will result in compostable products disposed into the waste stream or a stifling of innovation.

While the current certification process for compostable products is important, it is outdated and does not reflect the processing realities of current composting and anaerobic digestion facilities. This is an issue also currently under review in the United Kingdom.¹ The BNQ is also developing a standard for digestate in Quebec prompting the importance for uniform definitions and understanding. Other provinces have committed to developing rules for how single use plastics and compostable products are managed at their end-of-life stage, and federal government procurement policies will have to consider the impact of potentially inconsistent policies across the country.

Given the potential influence that purchasing the federal government could have on supply chains, we would express caution in how a standard is defined/developed and suggest more work is necessary to ensure the standards mesh with both current and new organics processing infrastructure. We understand the market is moving in this direction but want to ensure we end up with better environmental outcomes. This may include potential research and development to explore ways in which these materials could be managed more effectively and efficiently within existing or new facilities. The CBA, OWMA and their members would be pleased to work with the federal government to ensure the standard is properly set and to discuss future research and development projects.

We would be pleased to meet with staff to discuss in further detail at the next convenient opportunity

¹ For more information - <https://www.gov.uk/government/consultations/standards-for-biodegradable-compostable-and-bio-based-plastics-call-for-evidence>.



Sincerely,

A handwritten signature in blue ink that reads "Jennifer Green".

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A handwritten signature in black ink that reads "Mike Chopowick".

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A handwritten signature in black ink that reads "Alex Gill".

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